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August 23, 2019

BY ECF & EMAIL

Hon. Paul A. Engelmayer
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Jones, et al., 18 CR 834 (PAE)

Dear Judge Engelmayer:

A. INTRODUCTION

This letter is submitted on behalf of defendant Kifano Jordan in anticipation of his September 6, 2019 sentencing. With this letter, the defendant respectfully requests a sentence that is “sufficient, but not greater than necessary to comply with the purposes” set forth in 18 U.S.C. § 3553(a)(2) due, in part, to the “nature and circumstances of the offense and the history and characteristics of the defendant.” 18 U.S.C. § 3553(a)(1). As demonstrated herein, a guidelines sentence of fifteen years imprisonment – the sentence recommended by Probation – is more than adequate to meet the ends of justice in this case, especially in light of the multiple mitigating factors that we present, including the defendant’s success as an entrepreneur despite his extraordinarily difficult childhood and his extensive mentoring and support for others in his community.

**B. THE DEFENDANT’S GUILTY PLEA
AND RESULTING GUIDELINES RANGE**

On March 28, 2019, Mr. Jordan pleaded guilty pursuant to a plea agreement to Counts One and Two of a two-count Superseding Information which charged him with possessing a firearm in furtherance of a crime of violence, in violation of 18 U.S.C. § 924(c) (Count One), and possessing a firearm which was brandished and discharged, also in violation of 18 U.S.C. § 924(c) (Count Two). See March 21, 2019 Plea Agreement (“Plea Agreement”) at p. 1. Mr.

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Jordan faces a statutory minimum of 15 years and a maximum term of life imprisonment. *Id.* at p. 2.

As recounted in the Presentence Investigation Report (“PSR”), the Guideline for violations of 18 U.S.C. § 924(c) is U.S.S.G. § 2K2.4. PSR at ¶ 53. Pursuant to 2K2.4(b), the guideline sentence for both Counts One and Two becomes the minimum term of imprisonment required by statute, with Chapter Three adjustments and the defendant’s criminal history having no application to this calculation. *Id.* Accordingly, Mr. Jordan’s Guidelines are 60 months on Count One and a consecutive 120 months on Count Two, resulting in a total of 180 months imprisonment. PSR at ¶¶ 100-102.

**C. THE DEFENDANT’S BACKGROUND
AND THE NATURE OF THE OFFENSE –
APPLICATION OF § 3553(a) FACTORS**

Since the Supreme Court’s decision in *United States v. Booker*, 543 U.S. 220 (2005), the Sentencing Guidelines have been rendered advisory in nature, leaving sentences to the district court’s discretion, guided by the Guidelines and the other factors contained within 18 U.S.C. § 3553(a) and bounded by any applicable statutory minimum and maximum. This Section directs sentencing courts to “impose a sentence” that is “sufficient, but not greater than necessary, to comply with” the “need for the sentence ... to reflect the seriousness of the offense, to promote respect for the law, and to provide just punishment for the offense; to afford adequate deterrence to criminal conduct; [and] to protect the public from further crimes of the defendant” 18 U.S.C. §3553(a)(1)-(2) (emphasis supplied). In making this determination, courts are to consider “the nature and circumstances of the offense and the history and characteristics of the defendant” 18 U.S.C. § 3553(a)(1).

The History and Characteristics of the Defendant

We have attached 15 character letters in support of this submission, reflecting the significant and meaningful role that Mr. Jordan has played in the lives of friends and family members, as well as documenting his difficult childhood and the impact of his absentee father. PSR at ¶ 71. It would be impossible to include a letter from every individual whom the defendant has positively influenced. Still, the myriad letters on which we remark paint a consistent picture of a “great and loving father,” (August 15, 2019 Letter of Ava Atkinson, attached as Exhibit A) who is “kind and giving,” (July 26, 2019 Letter of Binta Harvey, attached as Exhibit B) as well as a “mentor[]” who helped many young men and women “believe” in themselves. Letter of Elaine Wright, attached as Exhibit C; see also August 15, 2019 Letter of Keona Delhall, attached as Exhibit D (“family means everything to Kifano”); July 11, 2019 Letter of Solange Cole, attached as Exhibit E (“one of the most loving people I know today”).

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Sadly, were it not for this sentencing, many of Mr. Jordan's exceptionally good deeds probably would have gone unrecognized.

Mr. Jordan's Difficult Childhood

As observed in the PSR and recounted in several of the submitted letters, Mr. Jordan's mother immigrated to the United States from Trinidad with the defendant and his sister when they were young children. PSR at ¶ 71. Mr. Jordan's father, who was married to another woman at the time, stayed with his six other children in Trinidad (see Letter of Fitzroy Cambridge, attached as Exhibit F) and provided no financial support to Mr. Jordan's mother, who was left to work "long hours" as a nurse in order to make ends meet. PSR at ¶ 73. Because of this lack of support from their father, Mr. Jordan and his sister were left alone in their Brooklyn home to "take care of themselves." Id. Worse, Mr. Jordan was "often picked on," as well as "assaulted and robbed" on "several occasions," causing him to begin suffering from anxiety and frequent nightmares. Id.

Sasha Jordan, the defendant's sister, describes their childhood in her letter to the Court: "we were latchkey kids, and spent many afternoons at the Brooklyn[] Children's Museum ... until [our mother] returned home from work." July 12, 2019 Letter of Sasha Jordan, attached as Exhibit G. Sasha Jordan reports that the fact that her brother excelled academically did not help his situation – he attended a gifted and talented educational program and was "bullied" and picked on "because of his brain," making it "hard to be a smart child in [his] neighborhood." Id.; see also July 10, 2019 Letter of Wally-Emmanuel Cambridge, attached as Exhibit H ("The bright-eyed little brother I knew ... changed a lot over [a] decade spent in Kings County, New York. He was more jaded, street smart and cynical, but his broad smile and comforting nature were still there.").

Friend Latoya Mclean-Conyers provides more detail in her letter to the Court concerning her and Mr. Jordan's childhood difficulties:

I recall us in junior high school protecting one another. We went to I.S. 390 which was right across the street from [the] Albany Projects. Sometimes it was a scary situation because there were a lot of times we witness[ed] violence. We were consider[ed] smart kids, because we were in the higher modules in school. Unfortunately there were times we got picked on because of our intelligence. We became family, people really thought we were cousins. We just protected one another and our friends. Wh[at] Kifano had, he would share.

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June 21, 2019 Letter of Latoya Mclean-Conyers, attached as Exhibit I.

Further, Mr. Jordan had little relationship with his father during his upbringing – Fitzroy Cambridge visited his son very rarely and “was never affectionate and often yelled at him during [his visits].” *Id.* He then attempted to justify his lack of affection and support by telling the young Kifano Jordan that he should be “grateful” that he even knew his father. *Id.* An admitted “failed parent,” Mr. Cambridge expresses his remorse to the Court for being an absentee father, the “same thing” his father did to him, writing: “[i]n the twenty plus years that Kifano lived in the USA[,] I was only able to visit him twice.” Ltr. of Fitzroy Cambridge, Ex. F. Mr. Cambridge also offers to “take the blame for his [son’s] serious wrongdoings,” which he attributes to his own failings as a parent. *Id.*; *see also* June 22, 2019 Letter of Ebony Morczinek, attached as Exhibit J (Jordan’s mother’s “long hours and the absence of a male presence in the home left him easy fodder for the gangs in Brooklyn”).

An Entrepreneur and Businessman

Despite his difficult childhood and his dropping out of high school after the tenth grade (PSR at ¶ 89), Mr. Jordan became a “successful entrepreneur” and businessman. *See* Ltr. of Elaine Wright, Ex. C. After leaving school, he purchased and sold used cars (*id.* at ¶ 93) and then in 2011, he co-founded Dollhouse Cosmetics with his then-girlfriend, making approximately \$50,000 per year from the endeavor until they split up. *Id.* at ¶ 92. In 2016, Mr. Jordan founded Trey Way Entertainment, a successful entertainment management company, wherein he earned a “pre-negotiated percentage of the proceeds ... from concerts and other promotional events ... on behalf of his clients,” which included multiple famous rap artists and musicians. *Id.* at ¶ 91. Additionally, Mr. Jordan founded and promoted a small record label, J-Five Records, which he operated together with his management company. *Id.* Many around him took notice of his drive to succeed and the positive impact of his efforts on his community – heaping praise on him in the submitted letters. *E.g.*, Letter of Fawwaz Cambridge, attached as Exhibit K (“His record label was the best thing that happened to his community. ... He became a true inspiration”); Ltr. of Ebony Morczinek, Ex. J (“realized his goal of becoming a music executive”).

A Mentor and Positive Role Model

While perhaps surprising given the nature of the charges in this case, many of those who submitted letters for the Court’s consideration included anecdotes of the defendant’s extraordinarily positive influence on their lives – whether by providing mentoring or just helpful advice. *See, e.g.*, Ltr. of Ava Atkinson, Ex. A (“always there for me when I needed him”); Letter of Sabre O’Neil, attached as Exhibit L (“He has been an excellent mentor to me[,] especially when I was in college pursuing my business degree”). For example, Michael Ortiz writes that

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“Kifano helped [him] become a better man,” concluding that “[f]rom understanding business strategies to seeing the bigger picture in all situations, [he] was the man who always listened.” Letter of Michael Ortiz, attached as Exhibit M; see also Ltr. of Fawwaz Cambridge, Ex. K (“My older brother is my role model, he taught be a lot of life changing lessons”).

Ava Atkinson informs the Court of her experiences with the defendant helping her start her own business:

Since I[] met Kifano back in June of 2013[,] he [has] always known how passionate I was about doing hair, the good friend [that] he is to me he wanted to help me start my own hair business. ... [H]e showed me if I really want something I have to go out and get it ... and he believed in me. He introduced me to young women who were already in the hair business and they were able to share great advice with me as well, he showed me that it's important to live my life to the fullest but also stay focused on my goals.

Ltr. of Ava Atkinson, Ex. A (emphasis supplied). Sabre O'Neil had a similar experience with the defendant, praising: “as an [as]piring makeup artist he advised me on some business ideas and how to become a business owner,” and further, he “has been nothing but a positive influence [on me].” Ltr. of Sabre O'Neil, Ex. L.

Keona Delhall recalls in her letter that Mr. Jordan encouraged her to return to school so that she could fulfil her dream of becoming a teacher:

[T]he first day we met I told him I was in school to become a teacher but I gave school a break. He wasn't too pleased with that, everyday he encouraged me to go back to school. I was so caught up into overworking myself with my job and having a social life, going to school became so overbearing for me. Kifano was so fun to be around, he'd always invite me out to parties, out to eat, movies even a regular day with him was so much fun. Until one day he told me he won't be inviting me out anymore until I sign back up for school, he'd always said it's cool to be a pretty girl but you need to have brains as well. Due to the fact he's always been a good friend of mine I knew he was looking out for me and wanted the best for me, so that week I decided to go back to school to sign up. I enrolled in the fall semester at Kingsborough Community College In September 2016, working at a dental office and going to school was a bit hard for me. I always knew Kifano was such a

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smart guy but I didn't know he was as smart as he is, one of the hardest classes I had to take in Kingsborough [was] [h]istory. Sometimes he would come over to my house to help me with homework or I would call him anytime of the day and he'd help me over the phone.

Ltr. of Keona Delhall, Ex. D (emphasis supplied); see also Ltr. of Elaine Wright, Ex. C ("He made my daughter believe in herself and many other young adults look up to him as well").

Sasha Jordan praises that her brother "always shared fundamental tips with [her] on how to be a successful business owner," (Ltr. of Sasha Jordan, Ex. G) and Binta Harvey adds that he "has always been there to push [her] to do better and continue to reach [her] goals." Ltr. of Binta Harvey, Ex. B; see also Ltr. of Solange Cole, Ex. E ("I can always count on him for his support in any way needed, he's always willing to help"). Mr. Jordan's brother, Wally-Emmanuel Cambridge, who was raised by their father before immigrating to the United States, writes of the aid that he received from the defendant during his college years:

Throughout my undergraduate years, he remained a constant source of support. As a black migrant it was very challenging adjusting to the racism, classism and xenophobia that existed around me. I sometimes would feel like giving up and returning to Trinidad, if only to escape the trials that lay ahead.

Despite the fact that he was a ... dropout, Kifano would give me sage advice on how to navigate my tribulations and always pushed me to stay in school and finish my degree.

Ltr. of Wally-Emmanuel Cambridge, Ex. H (emphasis supplied).

Dale Dickson recounts for the Court the possibly life altering advice that he received from Mr. Jordan when he was younger – counseling him against joining a gang:

Myself, as a young adult I did not have any family support or guidance, Kifano became my mentor, a positive impact on my life and big part of the person I am today.

He taught me I can accomplish anything if I give it 110%. He also taught me to believe in myself and have faith in myself.

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I've seen Kifano as a selfless, compassionate person for all the time I've known him. He helped me and my family, no matter what the situation. Over the past 20 years he supported me unconditionally. He helped me buy my first car and encouraged me to stay in school and graduate.

But, the most important thing that Kifano has done for me was stopping me from joining the Bloods gang. Although, Kifano is a member of the Bloods, he has never ever glorified it or encouraged me or anyone else to become a member of the Bloods. Kifano has only deterred myself and many other young teens from getting involved with gangs.

Kifano honestly never promoted or wanted me or anyone else to join the Bloods, he knew it was the wrong choice. Instead he only talked about all the bad things that come with it and how nothing good comes from joining a gang. Solely because of him I didn't join the Bloods and I couldn't thank him enough for that. Without him pushing me away from gangs as a teen I wouldn't be the person I am today. Because of this I strongly believe Kifano saved my life by stopping me from joining the bloods.

I am currently 33 years old. I own a successful business and I have no doubt in my mind that I wouldn't be in this position without Kifano's guidance and support.

Letter of Dale Dickson, attached as Exhibit N (emphasis supplied).

A Family Man and Surrogate Father

Nearly every letter submitted on behalf of Mr. Jordan touched on his own love and dedication for his children and his efforts to step in for those being raised without a father. See, e.g., July 11, 2019 Letter of Jude Joseph, attached as Exhibit O ("always brought gifts and kisses to his family"); Ltr. of Fitzroy Cambridge, Ex. F ("displayed love and affection to his other siblings"). Binta Harvey praises: "When it comes to his family and the people he love[s], he will give his last." Ltr. of Binta Harvey, Ex. B. And with regard to his involvement in the raising of their child together, Ms. Harvey adds:

He is a provider and protector for our son. Every young man needs a role model in their father and that is what Kifano strives to be

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every day for his son, even in the situation he is now. He is a reliable father and friend. Whenever his son or I w[ere] in need or distress, I could call him and he would be there.

Id. (emphasis supplied); Ltr. of Ava Atkinson, Ex. A (“so family oriented”); Ltr. of Dale Dickson, Ex. N (“a great father to his children”).

Family friend Solange Cole notes that during her conversation with the defendant’s mother, “she mentioned that Kifano is always the first to call her on her birthday, and any other special occasion.” Ltr. of Solange Cole, Ex. E. Similarly, half-brother Wally-Emmanuel Cambridge observes: “Throughout my 37 years, Kifano has been a constant in my life; the life of my siblings, and in the lives of my son and my daughter. His gregarious nature, generosity, kindness and sweetness will be dearly missed by us all.” Ltr. of Wally-Emmanuel Cambridge, Ex. H.

Further, friend Michael Ortiz recalls for the Court the advice that he received from Mr. Jordan concerning the “importance of family” in his letter:

At the end of the day[,] Kifano would always remind me about the importance of family. Kifano, a family man and father to 5 sons always reminds me that family is everything. No matter how much success or stardom one can achieve, your love and support will always come from family. That is one key element I always remind myself when times get tough.

Ltr. of Michael Ortiz, Ex. M.

Although he lacked a father figure during his childhood, many letter writers observed that Mr. Jordan voluntarily stepped in as a parent to others that he encountered in his community. Ava Atkinson informs:

Not only was he a good person to m[e], but my four children, my oldest is 20 years old, my twin boys are 14 years old and my youngest is a girl which is 12 years old. I’ve always been very overprotective of my kids as any parent would be but Kifano himself is a great and loving father to his own children. My kids looked up to him as an uncle, he would take my boys to play basketball, watch sports together and also go to arcades. ... Kifano and I were always close, I confided in him about how hard it is being a single mother of four. He always uplifted my spirits and

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gave me great advice; at times my kids would give me a hard time and Kifano would come over and have a sit down with all of us. He would make sure they listen to me and do what they have to in school, we shared many things in common one main thing was how important family is and he became family to us.

Ltr. of Ava Atkinson, Ex. A (emphasis supplied); see also Ltr. of Elaine Wright, Ex. C (“He made my daughter believe in herself and may other young adults look up to him as well”). Sasha Jordan adds that in their community, “the kids and their mothers loved [her brother] and he was respected because of the role he played [in their lives] [and] he would jokingly call them all his sons and daughters.” Ltr. of Sasha Jordan, Ex. G; see also Ltr. of Fawwaz Cambridge, Ex. K (“I know my brother to be that guy from his community to spend all his pocket money buying ice cream for all the young kids”).

Ebony Morczinek witnessed this dedication to others firsthand, recounting in her letter to the Court:

On one of his travels, he paid a surprise visit to one of my nephews, the son of another brother who lives in Trinidad & Tobago. Due to distance, that brother cannot be a physical presence in his son’s life. Kifano took the initiative to be a father figure for this young man and would organize his business travel in order to see him on a regular basis. On this instance, he found our nephew and his siblings in dire financial straits. He immediately stepped in financially and rallied the rest of the family to come to their assistance with clothing, food and moral support. Despite his commitments, he stayed in Virginia until the situation was stabilized. This is but one example of how he has been a provider for his own children, the children in his Brooklyn community and other members of our family.

Ltr. of Ebony Morczinek, Ex. J (emphasis supplied); see also Ltr. of Dale Dickson, Ex. N (“He was that figure in my life when I didn’t have anyone and helped me grow in my fragile teen years. He helped shape[] me”).

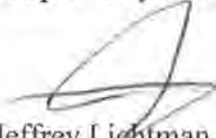
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D. CONCLUSION

Defendant Kifano Jordan comes before this Court asking for mercy. A life filled with good deeds and hard work has been marred by his criminal actions. Nevertheless, as the powerful enclosed letters reveal, Mr. Jordan is a decent and giving man who unlike many defendants has made very sincere efforts to help family and friends throughout his life, when no one was watching, when he had no need to impress a judge deciding his fate. For these reasons and the others stated herein, the mandatory minimum sentence of fifteen years imprisonment is respectfully requested.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'J. Lichtman', written over a horizontal line.

Jeffrey Lichtman
Jeffrey Einhorn

cc: Michael Longyear, Esq.
Jacob Warren, Esq.
Assistant United States Attorneys (by ECF & hand delivery)

EXHIBIT A

Hon. Paul Engelmayer
United States District Judge
40 Foley Square
New York, New York 10007

August 15th, 2019
Character Letter for Kifano Jordan

Dear Jeffrey Lichtman,

I have known Kifano Jordan since 2013 and he's always been very kind, caring, loving and understanding. Not only was he a good person to myself but my four children, my oldest is 20 years old, my twin boys are 14 years old and my youngest is a girl which is 12 years old. I've always been very overprotective of my kids as any parent would be but Kifano himself is a great and loving father to his own children. My kids looked up to him as an uncle, he would take my boys to play basketball, watch sports together and also go to arcades. He was so family oriented whenever he had the time, we all would go out to eat, movies, the beach, shopping or just do a family dinner at home. It was always a good time when Kifano came around, he's such a good-hearted individual. Kifano and I were always close, I confided in him about how hard it is being a single Mother of four. He always uplifted my spirits and gave me great advice; at times my kids would give me a hard time and Kifano would come over and have a sit down with all of us. He would make sure they listen to me and do what they have to in school, we shared many things in common one main thing was how important family is and he became family to us. Also, we've shared an apartment together for a year, us living together for a year made us even closer. It was such a good feeling sometimes to wake up from my nap after a long day of work to find my kids and Kifano watching movies and laughing together.

He was always there for me when I needed him as real friends should be, we went on three vacations together. First was California in 2017 where he met a few of my family members that live out there, in that short period of time them knowing him they all loved him. All of them got to experience great moments with him like I have, he made sure the few days we were there we all had nothing but fun, although Kifano can't dance to save his life he'd dance with us to make us laugh. Kifano loves good food, Asian Cuisine, Latin Cuisine or Caribbean cuisines it didn't matter to him he sure knows how to pick good restaurants. The whole time we spent in California he found new restaurants for us to try and they were actually pretty good. Kifano showed everyone a good time, my cousins were actually sad when we had to leave California. Shortly after our California trip we then went to Miami for his little cousin birthday. I thought it was so nice how he surprised her with a birthday vacation. He was planning it for months, he made sure he had activities planned out for her two friends and myself. He didn't mind just letting the ladies have fun, sometimes he'll join us or other times he'll just relax for the day. As I've stated before he's big on finding good restaurants, we ate at some of the nicest restaurant's Miami has to offer, we went jet skiing, zip lining and to the beach. I enjoyed my vacation in Miami with them we had so much fun.

Since I've met Kifano back in June of 2013 he always known how passionate I was about doing hair, the good friend he is to me he wanted to help me start my own hair business. We then went back to California in July in 2018, he showed me if I really want something I have to go out and get it can't be lazy and he believed in me. He introduced me to young women who were already in the hair business and they were able to share great advice with me as well, he showed me that it's important to live my life to the fullest but also stay focused on my goals. Truly Kifano is a great person and I hope from reading my letter and understanding the Positive influence he had on not only myself but my children you can see pass the mistakes he has made. My kids and I are very saddened by the news of his sentencing, we try to visit and write him as often as we can.

Sincerely,
Ava Atkinson

EXHIBIT B

July 26, 2019

Hon. Paul Engelmayer,

My name is Binta Harvey and I am writing this letter on behalf of Kifano Jordan. I have known Kifano for about 30 years. We went to the same Elementary and Junior High School together. We are also from the same neighborhood and we share an 11 year old son together. Kifano has always been a kind and giving person. Kifano is a people's person who has a generous heart; and that is what draws people to him along with his people's skills. When it comes to his family and the people he love, he will give his last. He is a provider and protector for our son. Every young man needs a role model in their father and that is what Kifano strives to be every day for his son, even in the situation he is in now. He is a reliable father and friend. Whenever his son or I was in need or distress, I could call him and he would be there. He takes his role as a father very seriously and strives to be better for his sons every day. Kifano is a smart and intelligent young man who has always been there to push me to do better and continue to reach my goals. Writing this letter, I recognize that Kifano has been convicted of some serious crimes, but I truly believe Kifano made some bad decisions and would take them back if he could. Kifano took a few wrong turns in life but I am confident with the help of family and friends, and the lessons learned throughout this whole process, he will take a right turn after serving his time. Kifano has a bright future ahead of him and will come home and put all his positive ideas and goals into play.

Yours faithfully,

BINTA HARVEY

Binta Harvey

EXHIBIT C

Hon.Judge Paul Engelmayer
United States District Judge
40 Foley Square
New York,New York 10007

Dear Hon.Judge Paul Engelmayer :

I met Mr.Jordan due to him giving my daughter a shoot at pursuing her dreams.At first I was skeptical but once I met him all my worries were put to rest.He truly mentored her on a professional and at times a personal level.One time she called herself running away he talked to her and convinced her to come home and also let her know where she went wrong.He has shown to me to be nothing but a young gentleman.The shottie people speak of I have never met nor seen.I find it hard to fathom he and Mr.Jordan are one in the same.He made my daughter believe in herself and many other young adults look up to him as well.Every situation has its pros and cons and the world will never know the magnitude of His capabilities if he is locked away for a long time.He can be rehabilitated.If given the opportunity I'm convinced he would be a productive member of society.We can't ignore he employed many people who would have never gotten a chance to live out their dreams.We should not over look the fact in a short time he was able to become a successful entrepreneur which shows he is capable of learning and adapting.In short I believe incarceration for a long period of time wouldn't benefit anyone especially if they are capable of rehabilitation and can become a member of society.

Best,
Elaine Wright

EXHIBIT D

Hon. Paul Engelmayer
United States District Judge
40 Foley Square
New York, New York 10007

August 15th, 2019
Character Letter for Kifano Jordan

Dear Jeffrey Lichtman, Esq.

I met Kifano back in the summer of 2013 through my older cousin, since the first day he has been nothing but genuine to me. Kifano has been to so many family events my family has thrown, anytime he was around it was always great energy. Kifano has such an uplifting spirit, from the first day we met I told him I was in school to become a Teacher but I gave school a break. He wasn't too pleased with that, everyday he encouraged me to go back to school. I was so caught up into overworking myself with my job and having a social life, going to school became so overbearing for me. Kifano was so fun to be around, he'd always invite me out to parties, out to eat, movies even a regular day with him was so much fun. Until one day he told me he won't be inviting me out anymore until I sign back up for school, he'd always said it's cool to be a pretty girl but you need to have brains as well. Due to the fact he's always been a good friend of mine I knew he was looking out for me and wanted the best for me, so that week I decided to go back to school to sign up. I enrolled in the fall semester at Kingsborough community college In September 2016, working at a dental office and going to school was a bit hard for me. I always knew Kifano was such a smart guy but I didn't know he was as smart as he is, one of the hardest classes I had to take in Kingsborough would History. Sometimes he would come over to my house to help me with homework or I would call him anytime of the day and he'd help me over the phone.

Not only was Kifano a kind friend to me, he also encouraged me to read books and feed my brain as he would say. One book he told me to read was "Three Magic Words: The Key to Power, Peace and Plenty" by Uell Stanley Andersen, I'm grateful he introduced me to that book because it taught me about how powerful the mind can be, also how to project my thoughts into reality. Kifano is also a great listener, I could come to him about my crazy boyfriend problems he would let me vent for hours. Not only would he listen to me he gave me great advice, he watched me grow into the young lady I am today. He just wanted me to be with the right guy, he always told me I could do better. Kifano also just wanted me to be happy no matter who I was with, I believe due to the fact his mother and him shared a great relationship he knew how women should be treated. All the women in my family and close lady friends loved him, he's always been very polite and well mannered. Family means everything to Kifano, there was one time in particular my cousin and I had a big fall out. We weren't speaking to one another for a few months, once Kifano found out he literally got all three of us together at brunch and made us talk it out. He didn't care who did what, who was right or wrong he just wanted us to act like family again. All my years of knowing Kifano he's been nothing but good to my family and I, he's such a kind hearted, loving and motivating person. I'm well aware of the Charges Kifano has

against him, he's made a few mistakes in the past. Knowing him for six long years I know he's a loving person, hopefully after reading my letter you get an understanding of how much of a good person he is. I'm deeply saddened about the news of his sentencing, I try to uplift his spirits whenever he calls me or when I visit . He had so much going for himself, I miss my dear friend.

Sincerely,
Keona Delhall

EXHIBIT E

07/11/2019

To:

Hon. Paul Engelmayer

United States District Judge

40 Foley Square

New York, New York 10007

Your Honour,

My name is Solange Cole and I am a very close family friend to Kifano Jordan. I am 43 years old, married for the last 12 years and a very proud mother of 3. I am currently pursuing a master's degree in health management and policy at NYU University. I have employed at NYU Medical Center as a financial analyst for the last 5 years. Kifano and I have grown up as cousins, I have known him for 37 years. Kifano and his family are very much family to me. I lived with them for five years in my very early childhood days in NYC after relocating from Trinidad. Kifano was the baby amongst the other cousins and I. He was very loving and still is one of the most loving people I know today. Kifano has a very big heart. He's very kind hearted. I remember Kifano walking around on his tippy toes drinking his vanilla ensure drinks as he didn't have much of an appetite. Always ready to give me some love with his hugs and kisses.

I remember taking his mother, Suzette Jordan to breakfast for her birthday three years ago, and during our conversation she mentioned to me that Kifano is always the first to call her on her birthday, and any other special occasion. Though our lives took separate paths as I became very much invested in raising my own family and my career, it was always like a day was never missed when I would see or speak with him. He has a very upbeat personality and his smile and charismatic personality can brighten up any room. I can always count on him for his support in any way needed, he's always willing to help. I miss seeing him and hearing him say, "what's up cuz? Our aunt that visits in the USA annually from Trinidad, and who stays with me in NYC visited last year. During her time with me Kifano visited often to spend quality time with her and my family. It was a great time as always he enjoyed spending time with us as it always is.

I know Kifano has been convicted of serious crimes. He's definitely reflecting on his life and definitely wants to make a better life for him and his loved ones. He comes from a very spiritual family and has been working on his own spirituality being, along with his mental health while incarcerated. I can confirm that he is a man of great integrity, very dedicated to his family and entirely peace-loving. I hope you will give him an opportunity for a second chance while making a fair decision.

Yours Faithfully,

Solange Cole
Solange Cole

EXHIBIT F

United States District Judge
40 Foley Square,
New York, New York 1007

Dear Hon Paul Engelmayer,

On the wall of the one room apartment that I and the other three siblings called home, hung a picture of a man that my mother said was my father. Who had a striking resemblance of a taxi driver in my community. Somehow I couldn't get it through my head after numerous nays from my mother that this person was not my dad who had migrated to England when I was just three, such was my longing for my father who was not there. This urging can do much to a child's mind in this development stage. Although I knew how I felt like and the longing that I had for my father I still went ahead and did the same thing to my son Kifano. After his grandmother which was an American citizen thought it best to get her daughter out of Trinidad because of our relationship, as I was a married man at the time.

Kifano's mother an administrative nurse took even her supervision away from him leaving the streets to be his influence, no father and no mother supervision. In the twenty plus years that Kifano lived in the USA I was only able to visit him twice but never in his formative years, although he would visit me here in Trinidad about three years ago he visited me with his girlfriend. We planted a fruit tree in the memory of their visit in our conversations on that said visit he told me as he got older, he understood why it was so difficult for me to really be a father that he wanted a father to be. He was saying in other words he forgave me for my absechnaism.

During his many visits to Trinidad Kifano displayed love and affection to his other siblings, his stepmother and others in the community should this letter reach the presiding judge I should be the one being on trial here and not my son Kifano. I would take the blame for his serious wrong doings to the federal government, as I should as a failed parent who gave Kifano the chance at a crime free life I say so because looking at his other siblings who I was able to neuter Ebony Eorciznek a Havard business school graduate and now a finance, Wally Emmanuel Cambridge a Howard University graduate and now an Attorney- at- law in Trinidad and Tobago, Medina Cambridge a graduate from John Moore university now a Marine Engineer in Trindad and Tobago and Fawwaz Cambridge soon to be a student at the Panam Flight school in Florida I shudder to think what he might have been, If he had the benefit of two parents . I knowing my son Kifano as I do I know he is rehabitable and I know he would be able to make something of his life if given a chance to do so.

I'm Fiztory Cambridge the father of Kifano Jordan and I'm guilty of the serious federal charges against my son and as such I make a plead of leniency for him.

Your respectfully,
Fiztory Cambridge.

EXHIBIT G

July 12, 2019

Hon. Paul Engelmayer United States District Judge 40 Foley Square
New York, New York 10007

Dear Judge Engelmayer,

I am Kifano Jordan's Sister I am three years older than he is. Kifano and I grew up in a single parent home with my mother Suzette Jordan who is a Registered Nurse. Our mother worked long hours to provide for us we were latch key kids, and spent many afternoons at the Brooklyn Children's Museum with many other kids from our neighborhood until she returned home from work. We both excelled academically. My brother was sent to a school for the gifted and talented called Phillip Skylar where his grades far surpassed many of the other gifted children. As the years went on it was hard to be a smart child in our neighborhood my brother was bullied because of his brain and was forced to defend himself. While still being challenged academically it was

Kifano never gave up hope of a better neighborhood where children was safe. He loved the neighborhood children and would always buy ice cream for them when the ice cream truck came pass with its familiar music, the kids and their mothers loved him and he was respected because of the role he played he would jokingly call them all his sons and daughters.

I am a business owner in Arizona and my brother always shared fundamental tips with me on how to be successful in business owner. He has a charm with people that is undeniable. He showed me how to respect others and make them feel loved. I know he is convicted of a serious crime but want you to understand the man that is in your custody has a heart of gold for others customer service is one of his passions and the love that he radiates even to strangers is undeniable!!! Please have mercy on him we love him and our community and family needs him.

Sincerely yours, Sasha Jordan

Sasha Jordan 16610 S. 15th st Phoenix, Az 85048 480-719-9601 Sashajor@yahoo.com

EXHIBIT H

Hon. Paul Engelmayer
United States District Judge
40 Foley Square
New York, New York 10007
July 10th 2019.

I write this letter begging your leniency on behalf of my younger brother, Kifano Jordan.

He is my father's second son, and I am the first. Although we have different mothers, I was afforded the pleasure to grow up with him in Trinidad W.I. and we have remained close all of our lives.

I was extremely disheartened to hear about his conviction for the serious crimes he faced, as I believe he could have been anything that he decided to be; as I remember the boy he was and the man that still remains, who has much to offer to society.

I remember attending Sunday School with him, prior to his migration in the late eighties. He was always full of life, quick to make you smile and laugh, with his easy going nature being a welcomed presence in my home.

I too would migrate to the United States, though much later in the late nineties, and we were able to reconnect while I earned my bachelor's degree from Howard University in Washington D.C..

The bright-eyed little brother I knew had changed a lot over that decade spent in Kings County, New York. He was more jaded, street smart and cynical, but his broad smile and comforting nature were still there.

I remember as a freshman in Drew Hall, he would come at least once a month, and though we were both seventeen at the time, we were still able to share a bed as brothers. The street and external influences had never dulled his loving nature. And the boy I called "Fano-Li" still enjoyed snoring loudly in my ear, as he cuddled his older brother, much as we did as toddlers.

Throughout my undergraduate years, he remained a constant source of support. As a black migrant it was very challenging adjusting to the racism, classism and xenophobia that existed around me. I sometimes would feel like giving up and returning to Trinidad, if only to escape the trials that lay ahead.

Despite the fact that he was a middle school dropout, Kifano would give me sage advice on how to navigate my tribulations and always pushed me to stay in school and finish my degree.

I would eventually go on to get my BA from Howard in 2004, and my LLB and LLM from the University of Leeds in the UK in 2012. I would later be called to the Bar in Trinidad and Tobago in 2014.

Throughout my 37 years, Kifano has been a constant in my life; the life of my siblings, and in the lives of my son and my daughter. His gregarious nature, generosity, kindness and sweetness will be dearly missed by us all.

My sixteen year old son especially has taken the news particularly badly, as they were extremely close. I don't want to condone or minimize my brother's crimes. As an officer of the court, I am very au courant of the criminal justice system.

As a brother I can only plead for leniency on my brother's behalf. As a father, I can only ask you reduce his sentence so my children can one day soon see, the uncle they have grown up with and love.

No amount of money or fleeting street credibility can take the place of family. Sadly, my brother Kifano has just begun to internalize this lesson. He is brilliant, handsome, strong and sincere. He has a lot still to give to society. Please afford him the opportunity to do so, instead of being another melanated statistic.

I can only pray for a minimum sentence, so the light that still exists in my brother's eyes, will not be permanently snuffed out by the horrors of incarceration.

Thank you for your time and compassion.

Much Obligated,

Wally-Emmanuel Cambridge,

Attorney at Law.

EXHIBIT I

June 21, 2019

Hon. Paul Engelmayers

United States District Judge

40 Foley Square

New York, NY 10007

I am sadden by how difficult this letter is for me to write. I was given the opportunity to help you better understand my long time school friend. I wish there was an ideal place to begin. But where does one start when a love one life is on the line. I still believe in Kifano. He has always been a great person that came from a good home. I understand that it is contradictory, looking at what actually took place.

Growing up we lived on St. Marks. I ended moving their in fourth grade. I was award of the state. I didn't have many friends however Kifano was welcoming and very nice to me. Kifano was a very compassionate person. His whole family were loving and caring. He genuinely was concerned about those we grew up with. He was very likeable and I used to say he would be a great boyfriend due to sensitivity and his devotion to those he loved.

He is extremely bright, and the potential he has to give the world is buried inside. He is hurting more than any of us can imagine, and yet adapting to an extremely unpleasant situation better than most ever could.

He has a future ahead of him. He can actually turned his experience into something positive. I am pretty sure that you have encountered many young men that are smart beyond their years but with so much negativity around them can fall prey to their environment. I believe what he needs is hope. He has a chance of achieving these goals. I believe that he is aware of the pain that he has caused, and is just as shocked as the rest of us that he was capable of such horror.

I recall us in Junior High School protecting one another. We went to I.S. 390 which was right across the street from Albany Projects. Sometimes it was a scary situation because there were a lot of times we witness violence. We were consider smart kids, because we were in the higher modules in school. Unfortunately there were times we got picked on because of our intelligence. We became family, people really thought we were cousins. We just protected one another and our friends. When Kifano had, he would share. The laughter that he brought made my transition so much easier knowing that I have a friend like him.

I share this story because I think it emphasizes the kind of person Kifano was and still is. I think it also shows that there should be no concern for this kind of thing to happen again. Thank you for your time in reading this. I wanted to speak from the heart and hope you will forgive the informality of this letter. I realize you have a huge amount of things to consider in this case, and I hope I haven't sounded like a nagging friend. Thanks again for your attention.

Sincerely;

Latoya Mclean-Conyers

EXHIBIT J

Ebony S. Morczinek

Uhlandstr. 45, 10719 Berlin, GERMANY | +49 173 2742784 | ebony.cambridge@gmail.com

June 22, 2019

Hon. Paul Engelmayer

United States District Judge

40 Foley Square

New York, NY 10007

Your Honor:

I am writing on behalf of Kifano Jordan, who is appearing before your court due to federal weapons charges.

I am Mr. Jordan's older half-sister; we share the same father. Kifano has always been astute and hard-working in the pursuit of his dreams. He has traveled the country and indeed the world to realize his goal of becoming a music executive, an industry he joined only a few short years ago. On one of his travels, he paid a surprise visit to one of my nephews, the son of another brother who lives in Trinidad & Tobago. Due to distance, that brother cannot be a physical presence in his son's life. Kifano took the initiative to be a father figure for this young man and would organize his business travel in order to see him on a regular basis. On this instance, he found our nephew and his siblings in dire financial straits. He immediately stepped in financially and rallied the rest of the family to come to their assistance with clothing, food and moral support. Despite his commitments, he stayed in Virginia until the situation was stabilized. This is but one example of how he has been a provider for his own children, the children in his Brooklyn community and other members of our family.

I recognize and am saddened by his current situation; that his eagerness to succeed led him to the nefarious side of business. I blame the situation on poor choices made after his mother emigrated from Trinidad & Tobago to the United States when our father decided to remain married to my mother. Her intentions were noble, but her long hours as a nurse and the absence of a male presence in the home left him easy fodder for the gangs in Brooklyn. I believe that he is only now dealing with the anger and loneliness from his formative years.

I have worked in several settings including investment banking on Wall Street, leading leveraged buyouts at a private equity firm, MBA studies at Harvard Business School, leadership positions at Lufthansa, Berlin startups and billion-dollar telecommunications companies, as well as Board memberships at non-profits. I have also worked with students as a lecturer on entrepreneurship at Bucerius Law School in Hamburg, Germany as well as recruiting undergraduate students at Harvard, Howard and Spelman Universities in the USA. I have been married for 11 years and have two sons of my own. I believe these diverse experiences qualify me to comment that Kifano's drive and entrepreneurial acumen are rare. I fall on the mercy of the court and beg for clemency in his sentencing. Please do not force him to waste his most productive adult years away from his children, his extended family, and his community who all depend on his support. Your forbearance will decide whether Kifano can become the next Jeff Bezos or Bill Gates.

Sincerely,

A handwritten signature in black ink, appearing to read "Ebony S. Morczinek". The signature is fluid and cursive, with the first name "Ebony" written in a larger, more prominent script than the last name "Morczinek".

Ebony S. Morczinek

EXHIBIT K

Hon. Paul Engelmayer
United States District Judge
40 Foley Square
New York, New York 10007.

Dear Mr. Engelmayer,

While in this situation my brother is painted as a villan, I personally know him to be someone else. My older brother is my role model, he taught me a lot of life changing lessons while never stepping out of who he really is, which is basically a voice or guardian to the voiceless or defenseless around him. I know my brother to be that guy from his community to spend all his pocket money buying ice-cream for all the young kids, to be that guy walking an elderly woman home from the store with her groceries. His record label was the best thing that happened to his community, through social media I saw it for myself. He became some one to look forward to in his community, he became a true inspiration, basically saying to those that looked up to him such as myself, that the legal way is better for us despite whatever circumstances our life may be in, because there wouldn't be peace in your life if you can't legally enjoy the wealth that you seek to earn in life. To some it might sound as though it's just a dream, but to any kid in his community it's exactly what they need to hear coming from fatherless homes and being stuck on welfare.

For Me seeing his most recent mistake has been his biggest motivation for me in the sense that this is not how you are going to act when you become successful because our success as a family is already inevitable. My brother is so influential that I believe a conversation we had a few days before he got arrested is gonna motivate me for the rest of my life and in turn become a positive influence for the younger ones coming up around me.

Having shared this letter directly from my heart, I want to plead on Kifano's behalf for a sort of leniency in his sentencing. The streets of New York need more conscious adults that are trying to hustle and motivate the youth away from a life of crime while being strong enough to grasp there attention in an imperfect society.

Fawwaz Cambridge

EXHIBIT L

Hon.Judge Paul Engelmayer
United States District Judge
40 Foley Square
New York,New York 10007

Dear Hon.Judge Engelmayer :

I'm writing this letter on behalf of Kifano Jordan.Ive known Mr.Jordan for almost ten years.We have a professional and a personal relationship.He has been an excellent mentor to me especially while I was in college pursuing my business degree.Mr.Jordan has been nothing but a positive influence and example of a hardworking business owner in my interactions with him.We worked on many projects together and as an inspiring struggling make up artist he advised me on some business ideas and how to become a business owner.In working with Kifano I learned he is a very intelligent goal orientated,precise and extremely hardworking.He has shown me nothing short of a professional,proud entrepreneur .It saddened me to hear his current state because that is not the Mr.Jordan I know or worked with.The Mr.Jordan I know has given me job opportunities and advice that has been needed and well received.I just started my passion by getting a studio and he would have been my first invited guest.If he has taken responsibility for his actions it should be a consideration factor besides the positive things he has done.The Mr.Jordan I know cane and got me when I had no one to depend on.The Mr.Jordan I know bought all my brothers candy for his fundraiser.He picked my little sister up when I had a final.He wiped my tears when my Pop pop died so all I know of him is compassion,empathy and he's one of the funniest men I ever had the pleasure of knowing.If and when he is released I'm sure he will continue to be that and more.

Best,
Sabre O'Neil

EXHIBIT M

Hon. Paul Engelmayer
United States District Judge
40 Foley Square
New York, New York 10007

Honorable Judge Engelmayer,

My name is Michael Ortiz and I am a professional in the entertainment industry. I have known Kifano Jordan for two years through work. In an industry where building relationships are vital, friendships are also created. In the past year I have seen Kifano build an empire and bring the world music that has changed people's lives. It can take a lifetime for someone to show mental, physical and spiritual growth. For Kifano I saw growth within that year. I can also say that because of our friendship Kifano has helped me become a better man. From understanding business strategies to seeing the bigger picture in all situations, Kifano was the man who always listened. While I understand Kifano has been convicted of a serious crime I believe he has already taken the steps towards becoming a better man. I recently paid him a visit at Westchester County Correctional Facility and in that one hour I saw a changed man. A man who was accepting of his mistakes and looking for a new opportunity in life through God. I believe everyone deserves a chance to make a change in their life, God gave him his.

At the end of the day Kifano would always remind me about the importance of family. Kifano, a family man and father to 5 sons always reminds me that family is everything. No matter how much success or stardom one can achieve, your love and support will always come from family. That is one key element I always remind myself when times get tough. I'm thankful to have met Kifano and I look forward building many more years of friendship in however God allows it to be.

Sincerely,
Michael Ortiz

EXHIBIT N

Hon. Paul Engelmayer
United States District Judge
40 Foley Square
New York, New York 10007

Dear Judge Engelmayer,

My name is Dale Dickson. I've known Kifano Jordan for over 20 years, meeting him for the first time at the age of 12. For the past twenty years I've been employed. I've spent a lot of time with Kifano over the years and was with him on a daily basis for most of my early 20s. We are both aware of the gravity of his crimes. We've had conversations since his arrest, he is full of remorse and regret and takes ownership of his actions. Yes his crimes are serious, but this is not the man that I know. Being that I have spent a very long time with him on a daily basis for years, I'd like to give you a perspective that shows that he is more than the sum of the crimes he has committed.

Myself, as a young adult I did not have any family support or guidance, Kifano became my mentor, a positive impact on my life and big part of the person I am today. He taught me I can accomplish anything if I give it 110%. He also taught me to believe in myself and have faith in myself.

I've seen Kifano as a selfless, compassionate person for all the time I've known him. He helped me and my family, no matter what the situation. Over the past 20 years he supported me unconditionally. He helped me buy my first car and encouraged me to stay in school and graduate.

But, the most important thing that Kifano has done for me was stopping me from joining the Bloods gang. Although, Kifano is a member of the Bloods, he has never ever glorified it or encouraged me or anyone else to become a member of the Bloods. Kifano has only deterred myself and many other young teens from getting involved with gangs.

Kifano honestly never promoted or wanted me or anyone else to join the Bloods, he knew it was the wrong choice. Instead he only talked about all the bad things that come with it and how nothing good comes from joining a gang. Solely because of him I didn't join the Bloods and I couldn't thank him enough for that. Without him pushing me away from gangs as a teen I wouldn't be the person I am today. Because of this I strongly believe Kifano saved my life by stopping me from joining the bloods.

I am currently 33 years old. I own a successful business and I have no doubt in my mind that I wouldn't be in this position without Kifano's guidance and support.

Kifano has made some bad decisions and poor choices and has deep remorse for the things he has done but he is not a bad person.

Kifano is a great father to his children, a family man, a good friend, a mentor and has a big heart. Who has done a lot of good for a lot of people and will always have my support. He will be sentenced the same time that his sons are in their fragile teens years, when they need that strong figure in their lives, like he never had. He was that figure in my life when I didn't have anyone and helped me grow in my fragile teen years. He helped shaped me to be all the good that he is. And it hurts to see his sons not have that.

I sincerely hope that you can find it in your heart to take into account the tremendous good that he has done and understand that he is a positive person in many peoples lives. I'm not trying to justify his wrongs or say that all the good things he's done makes his crimes less serious than what they are. Kifano admits to his crimes he accepts and understands he will be sentenced for them. I'm writing this letter to ask you for leniency on his sentence, while I still understand that the decision is only yours. But I ask you to please think about me when you decide on his sentence, think about the young teen that Kifano wouldn't let join a gang, think about the young teen who Kifano encouraged to stay in school and think about a young man who has become a success story and not a statistic because of Kifano Jordan's guidance and unconditional support.

Respectful,
, Dale Dickson

EXHIBIT O

July 11, 2019

Hon. Paul Englemayer
United States District Judge
40 Foley Square NY 10007

Dear Judge Englemayer,

My name is Jude Joseph, previously Jude St.louis, Jude Subayar. I am a cousin of Kifano Jordan. I recognize that Kifano will be going before Judge Engelmayer for sentencing, but that is not the Kifano I know, Kifano has always been a kissing I love you Aunty Jude person, May God Protect and give favor at this time.

I have been close to Kifano all his life, he was brought up by a very loving family. Anything his mother Suzette could do for her children she did; by sending him to good schools, to further his education, and moving him to Indiana for a life out of the city to live with his aunt. My sister who is also Kifano's godmother Patricia St Louis, his Aunt Lynette Jordan and his Grandmother Ran Jordan all of whom have passed away, would also testify to the loving and kind hearted nature of Kifano Jordan.

My family has lived at 1461 Carroll St Brooklyn NY 11213 for many years and owned a Hair Salon Artistic Hair Studio located at 247 Parkside Ave, Brooklyn NY. When Kifano was younger he would come the salon help out and learn business tactics that he later used in life. Kifano owned several successful buisnesses and always gave back to his ommunity. My house in Brooklyn was the house our family would celebrate many holidays together. Kifano would come over and bring his friends and they were always happy and loving to each other. Kifano always brought gifts and kisses to his family. We love him and his loving personality.

Kifano is a very intelligent person and can be a very helpful member of society. He is kind and loving to his children and neighbors. May God be with him and have mercy on him at this time.

Thank You,

Jude Joseph